

FILED

APR 05 2019

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY AP DEPUTY

FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MARY ELLEN JOHNSON,

Plaintiff,

v.

SOUTHWEST RESEARCH INSTITUTE,

Defendant.

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CASE NO. 5:15-CV-00297-RCL

VERDICT FORM

Question No. 1

Do you find that Plaintiff Johnson would not have been terminated but for her complaints of sex discrimination?

Answer "Yes" or "No"

Answer: Yes

Question No. 2

Has Plaintiff Johnson proved that sex was a motivating factor in the Defendant SwRI's decision to give unequal tuition reimbursement to Plaintiff Johnson?

Answer "Yes" or "No"

Answer: Yes

Question No. 3

Has Defendant SwRI proved that it would have made the same decision to give unequal tuition reimbursement to Plaintiff Johnson even if it had not considered her sex?

Answer "Yes" or "No"

Answer: No

Question No. 4

If you answered "Yes" to Question Nos. 1 or 2 then answer Question No. 4. If you answered "No" to Question No. 1 and answered "No" to Question No. 2, you are finished and you should not answer any of Question Nos. 4-6.

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Johnson for the damages, if any, you have found Defendant SwRI caused Plaintiff Johnson?

Answer in dollars and cents for the following items and none other:

Past pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 200,000

Future pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 60,000

Wages from August 15, 2012 to [date of verdict].

\$ ~~156,000~~ 335,624

Benefits from August 15, 2012 to [date of verdict].

\$ -0-

Question No. 5

If you answered Question No. 4 and entered any amount of money greater than zero dollars (\$0.00) in the blanks for wages and benefits, then answer Question No. 5.

Do you find that Plaintiff Johnson failed to reduce her damages through the exercise of reasonable diligence in seeking, obtaining, and maintaining substantially equivalent employment after the date of her termination?

Answer "Yes" or "No."

Answer: yes

Question No. 6

If you answered "Yes" to Question No. 5, then answer Question No. 6. If you answer "No" to Question No. 5, you are finished and you should not answer No. 6.

How much would Plaintiff Johnson have earned had she exercised reasonable diligence under the circumstances to minimize her damages?

Answer in dollars and cents, if any.

\$ 185,624

Jury Foreperson: 